IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

LITIGATION

ETHICON WAVE 2 CASES LISTED IN

EXHIBIT A

Master File No. 2:12-MD-02327 MDL 2327

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT REPLY REGARDING PROF. DR. MED. UWE KLINGE FOR WAVE 2

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert reply filed in relation to Prof. Dr. Med. Uwe Klinge for Ethicon Wave 1, Dkt. #2200. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: August 18, 2016 Respectfully submitted,

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)
Thomas Combs & Spann, PLLC
300 Summers Street, Suite 1380
P.O. Box 3824
Charleston, WV 25338-3824
(304) 414-1800
dthomas@tcspllc.com

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731) Thomas Combs & Spann, PLLC 300 Summers Street, Suite 1380 P.O. Box 3824 Charleston, WV 25338-3824 (304) 414-1800 dthomas@tcspllc.com